

1 CLARENCE & DYER LLP
2 EDWIN K. PRATHER (State Bar No. 190536)
3 899 Ellis Street
4 San Francisco, California 94109
5 Telephone: 415.749.1800
6 Facsimile: 415.749.1694

7 Attorneys for Defendants
8 SYNPEP CORPORATION and CHI YANG

FILED

DEC 12 2006

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 SYNPEP CORPORATION and
16 CHI YANG,

17 Defendants.

Case No. CR 06-0374 SBA

**STIPULATION AND ~~PROPOSED~~
ORDER FOR MODIFICATION TO A
TERM AND CONDITION OF
DEFENDANT CHI YANG'S PRETRIAL
RELEASE**

18 Defendant Chi Yang has been released subject to the Court's standard terms and
19 conditions of release. One such condition is defendant Yang's limitation that he not travel
20 outside the Northern District of California. Defendant Yang would like this condition modified
21 so that he may travel freely in the United States, subject to approval by Pretrial Services.

22 Defendant Yang has been presented with employment opportunities -- specifically,
23 consulting and investment opportunities -- outside this District. As such, his continued
24 employment necessitates his travel outside the District.

25 An itinerary of any travel outside the District will be submitted to and approved in
26 advance by Paul Mamaril, defendant Yang's Pretrial Services Officer, or Mr. Mamaril's
27 designee. Mr. Mamaril has indicated his consent to the Court's modification of this term of
28 defendant Yang's pretrial release.

cc: WOB's Stats, Copy to parties via ECF, Lisa

*Pretrial
Financial*

Defendant may not leave California without permission in advance from Pretrial & may not
Similarly, Assistant United States Attorney Stacey Geis does not oppose the

Court's modification of this term of defendant Yang's pretrial release.

IT IS SO ORDERED.

Dated: December 12, 2006

U.S. without permission
Wayne D. Brazil
WAYNE D. BRAZIL
UNITED STATES MAGISTRATE JUDGE

Approved as to form:

/s/ Edwin K. Prather
EDWIN K. PRATHER
Attorneys for Defendant Chi Yang

/s/ Stacey Geis
STACEY GEIS
Assistant United States Attorney

/s/ Paul Mamaril
PAUL MAMARIL
Pretrial Services Officer

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